

Salt Management Strategy (SaMS) First Public Meeting Summary

Date/Time: Wednesday, January 17, 2018: 6:30 – 8:00 pm

Location: Arlington County Central Library: 1015 N Quincy St, Arlington, VA

Meeting Hosts: Department of Environmental Quality (DEQ) staff included David Evans, Will Isenberg, Catherine Nicely, Sarah Sivers, Rebecca Shoemaker, and Bryant Thomas. Interstate Commission on the Potomac River Basin (ICPRB, DEQ's "contractor" for the SaMS) staff included Karin Bencala, Heidi Moltz, and Jim Palmer.

Participants: The meeting was attended by 37 persons, consisting of private citizens and persons representing organizations such as environmental groups, private consulting firms, associations for water agencies and metropolitan governments and local, state and federal governments including Arlington County, Fairfax County, Northern Virginia Regional Commission, Virginia Department of Health, Virginia State Police and U.S. Environmental Protection Agency.

Meeting Summary

- The meeting opened with a 30 minute informal session that allowed participants to view information and talk with representatives of:
 - Virginia DEQ: two table displays were available presenting information on: (1) the Accotink Creek chloride TMDL and water quality monitoring trends relevant to chloride levels in area waters, and (2) the SaMS project plan, goals, timetable, and stakeholder survey responses.
 - ICPRB: information on the technical report of impacts of winter salt use, and costs and benefits of improved salt use practices, which ICPRB prepared under DEQ contract for the SaMS project.
 - Fairfax and Loudoun Water: general drinking water information and issues associated with rising chloride levels in source waters.
- The plenary session began at 7:00 pm. Dave Evans presented for DEQ, opening with several slides that provided the project context and general descriptive information. He then shared a brief verbal summary of key points from a planned presentation by Dr. Wilf Nixon of the Salt Institute – Dr. Nixon was unable to attend the public meeting due to weather effects on his flight plans. Dave then introduced Heidi Moltz and Karin Bencala of ICPRB who presented highlights of their technical report from a comprehensive literature review of the impacts of salt releases to the environment, and the costs and benefits of improved winter salt use practices. After a few questions that are summarized below, Dave completed the DEQ presentation to highlight the goals and objectives for the SaMS project, summarize responses from 58 SaMS survey participants, and share the SaMS project schedule. Mr. Evans closed the meeting by inviting public comment (Jan. 17-Feb. 16, 2018) on (1) the SaMS project plan, (2) interest to participate in the Stakeholder Advisory Committee (SAC), and (3) the ICPRB technical report. All presentations have been posted to the SaMS website at <http://www.deq.virginia.gov/SaMS/MeetingMaterials.aspx>.

- Summarized below are questions and input provided by participants during the plenary session:
 - #1: Question was asked of ICPRB about how people can be informed/educated about what to expect during winter weather events. The commenter observed that many people expect to have same driving conditions all year.
 - Response: ICPRB noted that some States further along in efforts to address winter salt use issues have used public education and outreach to foster acceptance of lower expectations for post-storm accessibility. Some States have also set restrictions on salt product application in proximity to identified environmentally sensitive areas (wetlands, etc.). Additionally, more clearly defined “levels of service” expectations can be an important aspect to consider during development of the SaMS. DEQ added that there will be a number of different workgroups formed during this project, and DEQ will comprehensively explore ways to lessen environmental impacts while ensuring high levels of public safety/accessibility.
 - #2: Question was asked of ICPRB whether the literature review looked at experiences in Scandinavian countries.
 - Response: ICPRB responded that while it had noted some literature from Scandinavia, the literature review focused on North America.
 - #3: Question was asked of ICPRB if the SaMS will look at using alternatives to salt.
 - Response: ICPRB noted that options will be reviewed during strategy development, and then observed that this question was more appropriate for DEQ to address. DEQ said the various products other than salts used under different conditions are expected to be explored during the strategy development. As part of this effort, DEQ has reached out to universities to invite them to the strategy development to help with looking at the alternatives. DEQ also noted that the Snow and Ice Management Association (SIMA), as well as other winter service provider forums, have compiled much relevant technical information on BMPs and alternative products that will help to inform strategy development. DEQ noted that all options are on the table for further exploration/consideration during the stakeholder process.
 - #4: Question was raised as to what tools DEQ has to require VDOT and others to use better alternatives.
 - Response: DEQ noted that its regulatory authority is limited to activities that are subject to permitting requirements. MS4 (Municipal Separate Storm Sewer System) permits provide the clearest authority to specify requirements or expectations for winter salt use, and MS4 permittees within the Accotink Creek watershed will have requirements to implement the chloride TMDL incorporated into their permits during the next reissuance. This will initiate their requirement to take action, although some permittees may take steps prior to their permit’s reissuance. To

address non-regulated entities within the Accotink Creek watershed and regulated and non-regulated entities located outside of the Accotink Creek watershed, DEQ will pursue a proactive process and work collaboratively with these stakeholders to address this issue, both in the Accotink Creek watershed and proactively through the larger Northern Virginia region.

- #5: Question was asked about the timeline for strategy development.
 - Response: DEQ responded that the SaMS development timeline is approximately two years long, and noted that the schedule and strategy development process would be summarized in several additional slides. The remainder of the DEQ presentation on this and a summary of the SaMS survey responses immediately followed.
- #6: Question was raised of how DEQ was involving property management groups.
 - Response: DEQ noted it is challenging to get responses from property owners/managers, but the outreach efforts already conducted include contacting 10 Homeowner Associations. (While not stated in the meeting response, additional outreach has occurred to Property Owner/Management Associations and individual companies). Overall, DEQ has reached out to almost 200 stakeholders, and welcomed feedback that could help to bring additional stakeholders to the table.
- #7: Question asked if everyone that applies salt is required to have training, and whether DEQ will require training in the SaMS.
 - Response: DEQ observed that it has limited authority/ability to require training, but that training requirements could potentially be incorporated into a permit, such as the MS4 permits. More generally, the SaMS will likely include training recommendations, and give significant attention in education and outreach materials of the importance of improved salt use practices.
- #8: Comment was offered that DEQ could best engage commercial properties by reaching out through Chambers of Commerce and local elected officials.
- #9: Question raised as to whether DEQ has reached out to landscaping companies who perform winter maintenance services.
 - Response: DEQ has benefited from the advice of a national expert in this field to aide in communications with local landscaping/winter service contractors and has reached out through extension offices, but it has been challenging to engage them to date, and DEQ is continuing to work on this.
- #10: Question was raised as to whether DEQ is working with VDOT on this initiative.
 - Response: VDOT was very actively involved in the TMDL development, and DEQ has had good conversations with them in planning for the SaMS. VDOT originally was to be involved in this meeting, but they are just now able to discuss the SaMS with new VDOT leadership (with change in

administration) and those conversations were not completed in time for their participation in this meeting. DEQ will continue to work with VDOT going forward and anticipate that they will be actively involved in the SaMS process.

- #11: Question asked of whether DEQ will address salt products sold at “big box” stores for private residential application (e.g. to display signage and/or other educational materials with salt products).
 - Response: DEQ hopes to engage large retail stores. The education and outreach elements of the SaMS will be important to address this.
- #12: Comments provided by a representative of the Virginia State Police that they conduct multi-discipline safety training (SHRP2) that ensures consistent understanding of how to collaboratively respond and communicate across organizations during highway emergencies to achieve “quick clearance” and other goals. Requirements to complete this training are written into contracts (VDOT has contracts for 4,000 private trucks in Northern Virginia alone). When there is a highway accident incident, all agencies involved have had the same training and are able to work better together. The representative suggested that similar training requirements may be useful to consider for application to the many parties that are involved in salt use for winter maintenance.
 - Response: DEQ expressed appreciation for this example of systematic solutions, which are highly relevant to the SaMS.
- #13: Commenter with Fairfax County inquired whether larger jurisdictions/MS4s could compile and provide any specific information now that would help with development of the strategy.
 - Response: DEQ noted a strategy will not be framed in detail before having the benefit of stakeholders input, which will begin in earnest at the Feb. 27, 2018 Stakeholder Advisory Committee (SAC) meeting. At the same time, DEQ will consider information for stakeholders to prepare and will organize its thoughts and share them at the SAC meeting to avoid the frustrations stakeholders might experience if asked to frame a strategy from a blank sheet.
- #14: Comment was made that there are probably a lot of impairments that are due to chlorides. Question was asked whether there will likely be more chloride TMDLs and whether in the future DEQ will use this strategy as guidance for other salt management strategies.
 - Response: DEQ explained that it hopes to use the SaMS broadly in the Northern Virginia region, as the level of effort to develop it will be substantial. While many area streams may exceed chloride criteria levels, it is not in DEQ’s current plans to complete additional chloride TMDLs unless identified through the stressor analysis process. Rather it is hoped that the SaMS will provide a broadly applicable framework to address the impacts of winter salt use throughout Northern Virginia. It was noted that EPA has become more open to TMDL alternatives, and the strategy

developed may be an acceptable alternative to completing a multitude of individual chloride TMDLs. DEQ also observed that the SaMS will be different than other TMDL Implementation Plans because it will address both regulated and non-regulated sources, since some BMPs will be included in MS4 permits for regulated entities.

- #15: Question was posed as to whether DEQ will be enforcing the TMDL now, or will await completion of the strategy before enforcing it.
 - Response: DEQ replied that requirements to address TMDL wasteload allocations become enforceable when they are incorporated into permits, at the time of permit renewal.

The meeting concluded at 8:05 pm after DEQ thanked participants for their attendance and contributions, and reminded everyone that it will be seeking public comments on the SaMS proposal overall, on their interest to participate in the SAC, and on the ICPRB technical report through February 16, 2018.